

FAQ Benzene Handbook Documents BB FF

40 Is the benzene in the condensate from coke oven gas lines counted in the determination of TAB?

Benzene in any aqueous waste that is generated within the facility boundary of a coke byproduct recovery plant is counted. However, condensate generated outside the byproduct recovery plant, such as in the steelmaking complex, is not counted in the TAB determination. [Citations: 40 CFR §61.300(a) and 40 CFR §61.340(a)]

46 What is the point of generation for wastes at coke byproduct plants that are processed in sources that are already controlled by the benzene NESHAP for coke byproduct recovery plants? For example, are TAB and benzene concentration determinations made before or after the ammonia stripper?

For these sources, the point of generation is defined as the location where the waste exits a unit that is controlled by the byproduct plant NESHAP (40 CFR§61 Subpart L) and before it is exposed to the atmosphere. If the units up to the ammonia stripper are controlled (as required for metallurgical coke plants), and the ammonia stripper is a closed system (vented back to the coke oven gas), the point of generation is the wastewater leaving the ammonia stripper. [Citation: 40 CFR §61 Subpart L]

Current rule

61.355(b)(2)

(b) For purposes of the calculation required by paragraph (a) of this section, an owner or operator shall determine the annual waste quantity at the point of waste generation, unless otherwise provided in paragraphs (b) (1), (2), (3), and (4) of this section, by one of the methods given in paragraphs (b) (5) through (7) of this section.

(1) The determination of annual waste quantity for sour water streams that are processed in sour water strippers shall be made at the point that the water exits the sour water stripper.

(2) The determination of annual waste quantity for wastes at coke by-product plants subject to and complying with the control requirements of §61.132, 61.133, 61.134, or 61.139 of subpart L of this part shall be made at the location that the waste stream exits the process unit component or waste management unit controlled by that subpart or at the exit of the ammonia still, provided that the following conditions are met:

(i) The transfer of wastes between units complying with the control requirements of subpart L of this part, process units, and the ammonia still is made through hard piping or other enclosed system.

(ii) The ammonia still meets the definition of a sour water stripper in §61.341.

Definitions

Waste stream means the waste generated by a particular process unit, product tank, or waste management unit. The characteristics of the waste stream (e.g., flow rate, benzene concentration, water content) are determined at the point of waste generation. Examples of a waste stream include process wastewater, product tank drawdown, sludge and slop oil removed from waste management units, and landfill leachate.

Waste means any material resulting from industrial, commercial, mining or agricultural operations, or from community activities that is discarded or is being accumulated, stored, or physically, chemically, thermally, or biologically treated prior to being discarded, recycled, or discharged.

Waste management unit means a piece of equipment, structure, or transport mechanism used in handling, storage, treatment, or disposal of waste. Examples of a waste management unit include a tank, surface impoundment, container, oil-water separator, individual drain system, steam stripping unit, thin-film evaporation unit, waste incinerator, and landfill

Coke By-Products NESHAP Background document

Waste per Subpart L

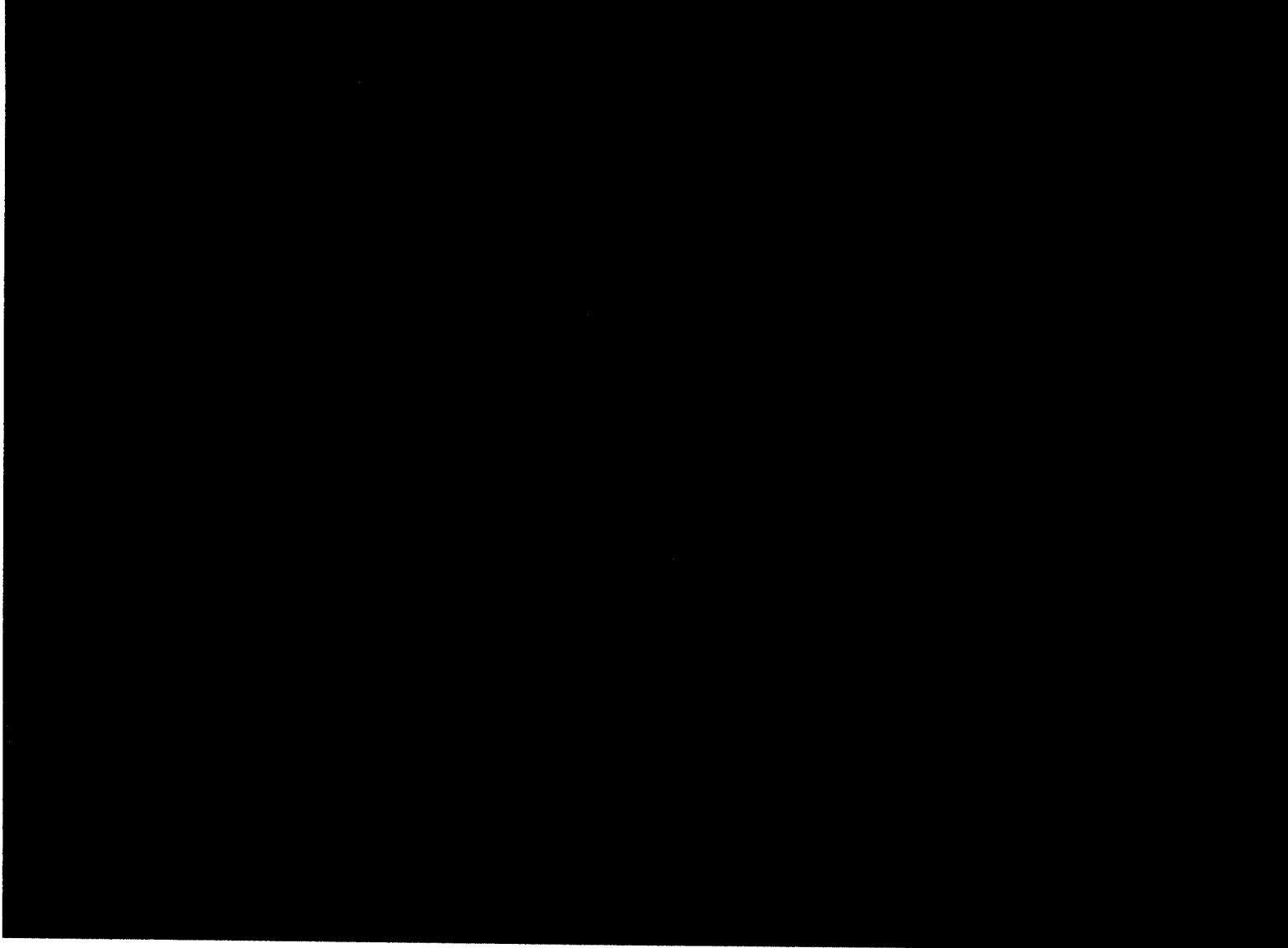
Page 59 of 466, see figure 3-9, streams leaving wash oil still, light oil separator, light oil rectifier, separators etc, all identified as wastewater to intercepting sump.

Corresponds with streams in NEIC process diagrams, appendix A (for us the intercepting sump is the naphthalene sump)

Also see section 3.2.7 (starts on pg 62) discussion on wastewater processing, and discussions of sumps.

(5) Deliberative Process





ADI Determinations

Attached are two determinations that clarify that the tar decanter must be sealed, and everything going to the ammonia still must also be sealed.



United States Environmental Protection Agency
Office of Enforcement and Compliance Assurance
Office of Criminal Enforcement, Forensics and Training

National Enforcement Investigations Center

NEICVP0944P01

PROJECT PLAN
Focused Multimedia Investigation

ABC Coke
Tarrant, Alabama
NEIC Project No.: VP0944

April 2011

Martha Hamre, Project Manager
Doreen Au
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ATTACHMENT

- A NEIC Site Health and Safety Plan

ACCEPTANCE AND SIGN-OFF

This project plan has been reviewed and constitutes the minimum inspection requirements for personnel engaged in field activities at this project site. However, the project manager, or designee, has the authority to change these requirements, on the basis of conditions present at the site. Any changes will be explained and documented in the field logbook.

PREPARED BY:

Project Manager Martin Vaneff

Date 04/18/2011

REVIEWED BY:

Field Branch

Quality Manager Carrie Mott

Date 4-18-2011

APPROVED BY:

Field Branch Chief: Greg Ford

Date 4-28-11

DISTRIBUTION LIST

Each of the following individuals has been provided with a copy of this project plan:

Martha Hamre, NEIC, project manager	Ron Mikulak, EPA Region 4
Doreen Au, NEIC, project team member	Nicole Radford, EPA Region 4
Kristine Pordesimo, NEIC, project team member	Todd Groendyke, EPA Region 4
Linda TeKrony, NEIC, project team member	John Goodwin, EPA Region 4
Craig Kubik, NEIC, Field Branch Chief	Steve Fletcher, NEIC, Safety, Health and Environmental Management Program Manager
David Parker, NEIC, Civil Program Coordinator	Dianne Clark, NEIC, technical editor
Carrie Middleton, NEIC, Field Branch Quality Manager	Linda Johnson, NEIC, principal analytical chemist
Gloria Coleman, NEIC, administrative support	

INTRODUCTION

BACKGROUND

U.S. Environmental Protection Agency (EPA) Region 4 requested EPA's National Enforcement Investigations Center (NEIC) to conduct a focused multimedia (Clean Air Act [CAA] and Resource Conservation and Recovery Act [RCRA]) compliance investigation of the ABC Coke (ABC Coke) coke/utilities plant in Tarrant, Alabama [Figure 1]. According to the ABC Coke website, (<http://www.drummondco.com/operations/coke/ABCCoke.aspx>), the Drummond Company, Inc. acquired ABC Coke in the early 1980's as part of its acquisition of the Alabama By-Products Corporation. ABC Coke has an annual capacity of approximately 730,000 tons of saleable coke, and it operates three coke oven batteries (battery Nos. 1, 5, and 6) consisting of a total of 132 ovens. ABC Coke's production operations and associated waste streams are subject to major environmental statutes, including the Clean Water Act (CWA), RCRA, CAA, and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Its operations also are regulated by environmental permits and regulations administered by EPA, the Alabama Department of Environmental Management (ADEM), and the Jefferson County Department of Health (JCDH).

SCOPE OF WORK

Goals and Objectives

The objectives of the investigation are to determine ABC Coke's compliance with CAA, RCRA, and associated regulatory permits. The focus of the NEIC investigation will be the coke by-product portion of ABC Coke's coke plant. NEIC personnel will also document activities and conditions that, although not specifically regulated, have impacted or could potentially impact the environment. This project plan outlines proposed field technical activities to be conducted by NEIC during the onsite inspection, which is scheduled for May 4 through 10, 2011. EPA Region 4, ADEM, and JCDH inspectors may participate and/or observe the onsite inspection. All activities of NEIC personnel will be performed in accordance with the NEIC quality system.

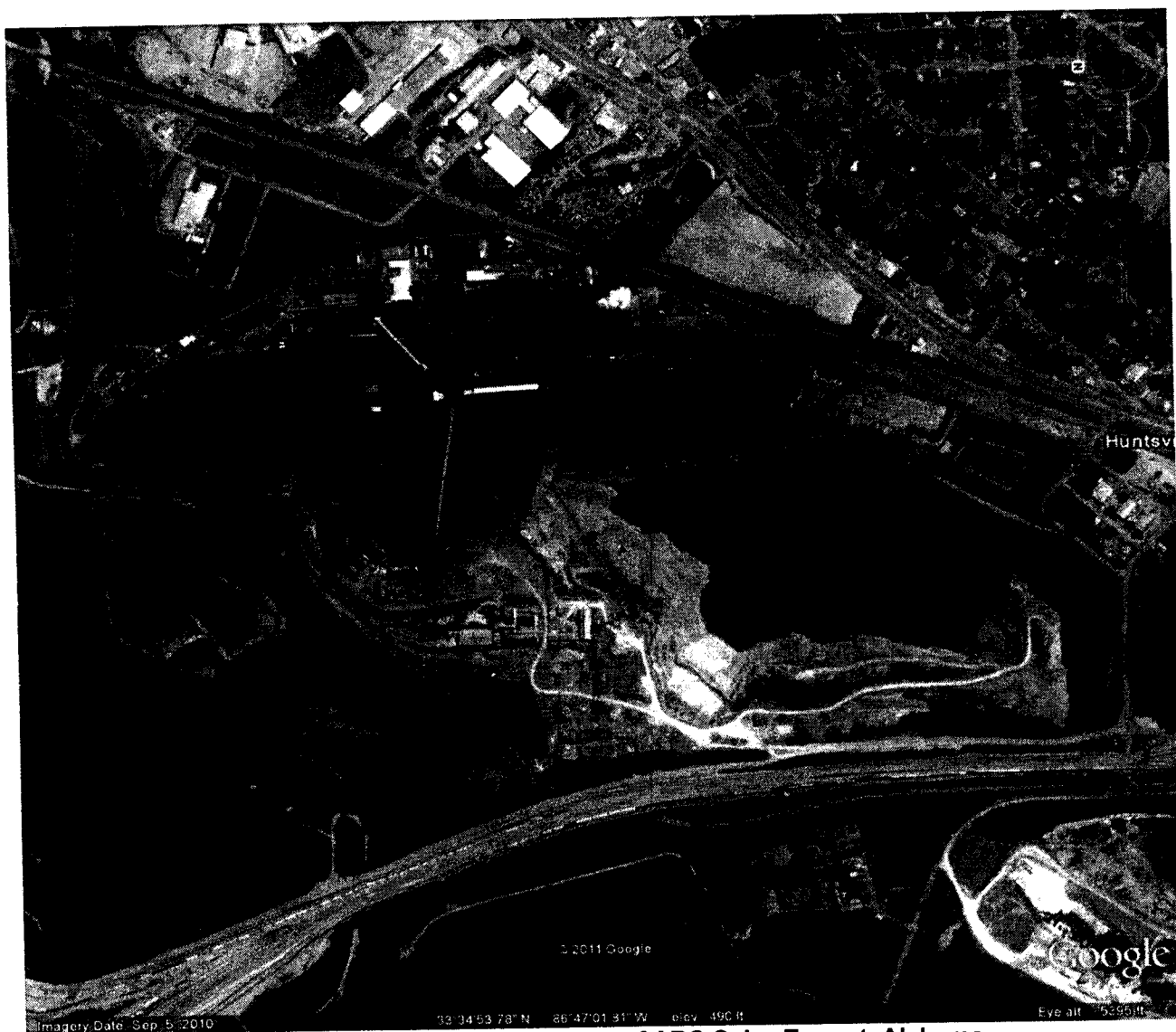


Figure 1. Google Earth Pro Image of ABC Coke, Tarrant, Alabama

Clean Air Act

Database and file information have been compiled and are currently being reviewed. This work includes the review of Federal and State files for information regarding facility operations, monitoring reports, inspections, and enforcement actions. During the onsite inspection, the field team will perform the following activities:

- Determine regulatory compliance with 40 Code of Federal Regulations (CFR) Part 61 Subpart FF – National Emission Standard for Benzene Waste Operations (BWON).
- Determine regulatory compliance with 40 CFR Part 61 Subpart L – National Emission Standards for Benzene Emissions from Coke By-Product Recovery Plants, which also includes leak detection and repair (LDAR) provisions.

- Determine compliance with Title V requirements (permit No. 4-07-0001-02 issued November 17, 2008, expiring November 17, 2013) as applicable to BWON and 40 CFR 61 Subpart L.

Resource Conservation and Recovery Act

ABC Coke's coke plant (EPA Identification Number ALD000823179) is identified as a conditionally exempt small quantity generator (CESQG) of hazardous waste. The most recent ADEM RCRA inspection was conducted December 15, 2004. No areas of noncompliance were identified. Database and file information on this facility are currently being compiled and reviewed. According to a Region 4 inspection report (April 2002), the wastewater treatment plant at ABC Coke includes two surface impoundments. During the onsite inspection, the field team will perform the following activities:

- Determine compliance with RCRA hazardous waste management requirements.
- Identify regulated process-generated wastes.
- Determine compliance with applicable RCRA requirements for materials handled in the surface impoundments.

PROJECT/TASK DESCRIPTION

NEIC will support the inspection objectives by dividing its project team members into groups to address the CAA and RCRA portions of the inspection. Inspection activities will include the following:

- Conduct onsite process evaluations with focus on the coke plant by-product recovery system.
- Conduct onsite CAA and RCRA records inspection and verification.
- Conduct onsite benzene waste sampling and LDAR monitoring.
- Photograph and/or otherwise document site conditions and process configurations, if applicable.
- Analyze onsite collected samples.
- Prepare a report summarizing findings of the inspection, including analytical results from the NEIC laboratory in Denver, Colorado.

SAMPLING/MEASUREMENT PROCESS DESIGN

BWON sampling will be conducted in accordance with the NEIC operating procedure *Benzene Waste and Other NESHAP Sampling*, NEICPROC/02-005R1, and using methods described in 40 CFR § 61.355, as guidance. Samples collected will be tagged, placed in zipper-lock bags, sealed with tamper-evident tape or bags, and placed in locked ice chests. Samples may be collected from individual points of generation and/or common wastewater collection locations. Wastewater samples will be collected in 40-milliliter amber vials pre-preserved with hydrochloric acid. After conferring with facility personnel, sampling locations will be evaluated and at least one sample will be collected at each location. The collection temperature will be recorded using NEIC equipment. Facility personnel will be given the opportunity to collect their own co-located samples of all NEIC samples. High-level and low-level benzene samples will be kept in separate ice chests to avoid cross-contamination. All samples will be placed on ice immediately after collection; this placement and subsequent icing will be documented. Trip blanks will be included for each day of sampling in the low-level benzene ice chest. BWON sampling will be conducted by the NEIC field team of Doreen Au, Martha Hamre, and/or Kristine Pordesimo. Any additional sampling protocols that may be needed will be based on site conditions and discussions with various NEIC and/or regional personnel, pursuant to the NEIC *Quality Management Plan* (QMP), NEICPLAN/01-001R14, and guidelines as appropriate.

NEIC personnel will collect samples, which will be analyzed at the NEIC laboratory. Samples are anticipated to be analyzed for benzene and naphthalene.

The sampling design for this project will depend upon case objectives. These objectives may change during the investigation; as a result, sampling and measurement design/collection may be modified in the field. Any modifications to this plan will be documented, and the reasons for such a modification will be explained. All procedures actually used will be documented.

LDAR monitoring will be conducted using NEIC Thermo Environmental TVA-1000 analyzers. Monitoring and calibration of all monitoring equipment will be conducted in accordance with NEIC procedures and/or manufacturer's recommendation conforming to EPA Reference Method 21, as specified in 40 CFR Part 60, Appendix A. Doreen Au, Martha Hamre, and/or Kristine Pordesimo will perform LDAR monitoring. Monitoring results, along with calibration information, will be documented in project logbooks. NEIC will conduct monitoring only requiring Level C personal protective equipment or less during this inspection.

Operation of the FLIR® GasFindIR camera and recording of infrared (IR) videos will be in accordance with the manufacturer's recommendation. Martha Hamre and/or Kristine Pordesimo will operate the FLIR® GasFindIR camera. It should be noted that operation of the FLIR® GasFindIR camera is not within the scope of NEIC's accreditation, but will be performed in accordance with the NEIC quality system.

DATA QUALITY/QUALITY CONTROL REQUIREMENTS

Data quality goals for the measurement and sampling data for this project are based upon the legal requirement for evidence in enforcement cases. Sampling and measurement methods will be selected to ensure that the data obtained will be the type and quality needed for the investigation. Ultimately, the decision as to whether certain measurements can be used in an enforcement case is made by the Government's counsel in consultation with the NEIC scientists responsible for the measurement. In any event, NEIC staff will follow the procedures contained in the NEIC QMP.

Quality control (QC) requirements applicable to a particular sampling or field measurement method will be followed. As applicable, a minimum of 1 field replicate sample will be collected for every 10 investigative samples to assist with assessing errors associated with sample heterogeneity, sampling methodology/handling, and analytical procedures. Preservatives used, if any, will be documented in the field logbook and on the sample tag and reported to the laboratory.

INSTRUMENT/EQUIPMENT TESTING/MAINTENANCE/CALIBRATION

The procedures to be used are generally described in Thermo Environmental TVA-1000 operating manual, associated NEIC operating procedure, and EPA Reference Method 21. Instruments will be calibrated in accordance with applicable standard operating procedures (SOPs), instrument manuals, and sound field practices. Calibrations will be documented, and all necessary information to validate the quality of field measurements will be provided.

EVIDENCE MANAGEMENT

The NEIC operating procedure *Evidence Management*, NEICPROC/00-059R3, including chain-of-custody and document control procedures, and the NEIC *Quality Management Plan*, NEICPLAN/01-001R4, where appropriate, will be followed during the investigation. Documents and records obtained from the facility will be uniquely numbered and listed on a document log. A photograph log will be maintained. A copy of each of the document and photograph logs, with a receipt for samples/documents, will be offered to the facility before completion of the onsite inspection. Any documents declared to be confidential business information (CBI), pursuant to 40 CFR Part 2, will be so noted on the document log and secured appropriately.

ANALYTICAL METHODS

As with sampling, the analytical methods selected will depend upon case objectives. Linda Johnson is the NEIC principal analytical chemist for this project. Samples are expected to be analyzed to determine compliance with environmental statutes identified in the Background section of this project plan. Specifically, samples will be analyzed for benzene and naphthalene. The PAC will develop a site-specific quality assurance project plan (QAPP) when samples are received by the NEIC laboratory.

APPLICABLE OPERATING PROCEDURES

Procedure Number	Procedure Name
NEICPROC/02-005R1	Benzene Waste and Other NESHAP Sampling
NEICPROC/00-059R3	Evidence Management
NEICPROC/00-069R2	Field Data and Data Package Review
NEICPROC/99-010R2	Field Quality Control Samples
NEICPROC/00-034R1	Field Safety and Health
NEICPROC/00-006R2	Field/Laboratory Measurement Activities
NEICPROC/00-011R4	Gas Phase Testing for Organic Contaminants
NEICPROC/04-001R1	General Sampling Activities
NEICPROC/99-016R1	Leak Detection and Repair (LDAR) Program
NEICPROC/99-009R2	Packaging, Marking, Labeling and Shipping of Dangerous Goods
NEICPROC/10-003	Project Acceptance

Procedure Number	Procedure Name
NEICPROC/10-004	Project Delivery
NEICPROC/00-074R3	Project File Management
NEICPLAN/01-001R4	Quality Management Plan
NEICPROC/00-061R2	Records Management Procedure
NEICPROC/00-067R2	Report Development, Review, and Control
NEICPROC/00-016R3	Toxic Vapor Analyzer (TVA-1000)

STAFFING PLAN

Core Team Roster

Role	Responsibilities	Name
Project manager	<ul style="list-style-type: none"> Define, understand, and communicate regional partner needs Control or delegate control of all NEIC project-related resources Comprehend and implement NEIC policies and procedures Establish and maintain project quality Identify and secure project team resources Serve as focal point for project communications Develop planning documentation Obtain customer approval and acceptance of the project plan Manage and monitor day-to-day project activities and provide direction to team members and supporting organizations Monitor and verify conformance with the health and safety plan (HASP) Manage and monitor quality targets and goals Provide project status reports Regularly review project status, evaluating performance criteria (scope, schedule, and quality) Initiate change requests as required (scope, schedule, or quality) Obtain customer approval for changes in scope, timing, or quality Obtain customer and management approval and acceptance of deliverables Provide preliminary findings to Region Conduct lessons learned session and develop recommendations for continuous improvement Develop draft and final reports Guide draft reports through review process Archive all project data Serve as primary contact for follow-up Provide support for sample collection and LDAR monitoring Write portion of CAA and executive summary reports 	Martha Hamre
Project team member(s)	<ul style="list-style-type: none"> Conduct CAA inspection, including sample collection Conduct LDAR monitoring Write portions of CAA and process description reports 	Doreen Au
Project team member(s)	<ul style="list-style-type: none"> Conduct CAA inspection, including sample collection Conduct LDAR monitoring Write portions of CAA and process description reports 	Kristine Pordesimo
Project team member(s)	<ul style="list-style-type: none"> Conduct RCRA inspection 	Linda TeKrony

	<ul style="list-style-type: none"> Write RCRA report 	
NEIC Safety, Health and Environmental Management Program Manager	<ul style="list-style-type: none"> Review and approve HASP Consult and advise team in response to changed conditions or emergency safety incidents 	Steve Fletcher
QA manager	<ul style="list-style-type: none"> Assist project manager with conformance with NEIC quality management system Review and approve project plan 	Carrie Middleton
Laboratory PAC	<ul style="list-style-type: none"> Write laboratory quality assurance project plan (QAPP) for sample analysis Conduct sample bottle preparation Conduct and coordinate sample analyses for BWON Prepare laboratory findings report 	Linda Johnson

Supporting Subject Matter Experts

Role	Knowledge Area/Expertise	Primary Choice(s) Name
Report and data package reviewer	BWON	TBD
Report and data package reviewer	LDAR	TBD
Report reviewers	CAA, RCRA, and process description	TBD

DOCUMENTS AND RECORDS/DELIVERABLES

NEIC anticipates the following customer deliverables for this effort:

Deliverables	Description	Recipient(s)
1. Project plan	Final plan will be delivered via email	EPA Region 4
2. Preliminary findings call	Email/ conference call	EPA Region 4
3. Draft report	Draft report will be provided as electronic copies on compact disc and will be delivered via mail, including necessary supporting documentation	EPA Region 4
4. Final report	Final report will be provided as electronic copies on compact disc and will be delivered via mail, including necessary supporting documentation	EPA Region 4
5. NEIC laboratory analysis report	Attachment to final report	EPA Region 4

PROJECT TIMELINE

Major Phases, Milestones and Tasks	Who	Target Work/Completion Dates									
PRE-FIELD PLANNING											
NEIC kickoff meeting	Project manager	04/19/11									
Prepare project plan	Project manager	04/04 – 04/15/11									
Final project plan	Project manager	04/29/11									
FIELD OPERATIONS											
Team arrives	Project team				05/03/11						
Onsite inspection	Project team				05/04 – 05/10/11						
Team departs	Project team				05/11/11						
POST-FIELD OPERATIONS											
Preliminary findings	Project team					05/26/11					
Lessons learned/team feedback meeting	Project team					05/20/11					
Final laboratory report	PAC					07/15/11					
Internal draft project report	Project team					08/05/11					
Internal draft report review	Reviewers					08/05/ –08/19/11					
External draft project report transmittal	Project team					08/31/11					
Regional review/ comment	Region 4					08/31 -09/23/11					
Final project report preparation	Project team					09/23 – 10/07/11					
Final project report submittal to customer						10/14/11					
FOLLOWUP											
Customer feedback	Project manager/ Program coord.									By 11/04/11	
Project/phase completion report (w/ QA manager and supervisor feedback)	Project manager/ Branch manager									By 11/18/11	
Organizing and review of records and project file	Project manager and field team									By 12/16/11	
Litigation/ negotiation support	Project team									TBD	

DATA MANAGEMENT/QUALITY MANAGEMENT

Output	Quality Criteria	Quality Assurance (QA) Method(s)	Evidence of Compliance	Quality Responsibilities
Project plan	Coverage of critical topics	Diverse review and comment	Comments received and incorporated	Project manager
Project field work assessment	Inspection objectives/tasks	Assessment	Documentation of meeting	Project team Management QA staff
Field and analytical data	LDAR and BWON procedures	Data package review; reviews of instrument calibration, field measurements, and calibration verification; determination of data usability Review and assessment of actual field sampling documentation, protocols used, and replicate sample data; determination of data usability	Agreement by author(s) and reviewers of presented data	Project team Reviewers: TBD
Draft and final reports	Clear, organized, technically accurate	Review of draft report by select reviewers prior to submittal to Region. Regional review and transmittal of comments	Agreement by author(s) and reviewers Acceptance by Region	Reviewers: David Parker Dianne Clark Other peer, team, legal, and quality reviewers to be determined

HEALTH AND SAFETY

Safety procedures will comply with all appropriate facility safety practices, the attached NEIC Site Health and Safety Plan [**Attachment A**], and applicable EPA and NEIC safety procedures. The NEIC safety procedures which will be followed are those documented in the NEIC operating procedure *Field Safety and Health*, NEICPROC/00-034, and applicable provisions of *EPA Safety, Health, and Environmental Management Guidelines* (2004 edition), NIOSH/OSHA/USCG/EPA *Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities* (1985 edition), and *EPA Standard Operating Safety Guides* (1992 edition).

COMMUNICATIONS PLAN

Target Audience	Communications Needs (What, When, How)	Responsible (Who will do it?)
NEIC management	Monthly project status report via TaskMaster. Change requests: Submit verbally with written confirmation.	Project manager
Customers	Overall project coordination, scheduling of tasks and deliverables, investigation findings, and change requests as needed, Project plan, draft/final reports delivery and schedules,	Project manager
Project team	Project plan: email delivery with kickoff meeting review. Daily "plan of the day" meetings during field operations. Monthly team meetings post-field operations. Include review of scope and schedule status, upcoming tasks, management of change and risk, and obstacles to success.	Project manager
Project manager	Health and safety concerns: Provide verbal description ASAP. Changes (actual or needed) that have a significant impact on the project scope, schedule, or resource needs: Provide verbal description ASAP. Newly identified risks: Provide verbal description ASAP.	Project team
NEIC Safety, Health and Environmental Management Program Manager	Health and safety incidents: Provide description ASAP, verbally or via email.	Project team/manager
Field Branch Quality Assurance Manager	Field sampling challenges/concerns and data quality or usability issues that arise	Project manager
NEIC management and Ron Mikulak, EPA Region 4	Change requests that affect the scope and timeliness of project deliverables.	Project manager

CHANGE MANAGEMENT

For purposes of this plan, a “change” is any significant unplanned condition or proposed activity that has an impact on the planned project scope, schedule, or resource baselines. Any participant or other concerned party may raise change requests to the project manager. The project manager will ensure that the information is documented and proactively managed to conclusion. The project manager will review the change to examine the need for such change, how it could be achieved, and what the consequences would be. If the change materially impacts the scope, schedule, or staffing/resource baselines, the project manager will verify with the respective NEIC supervisor(s) that the change is acceptable. On the basis of those conclusions, recommended action(s) will be proposed to the customer. The acceptance or nonacceptance of the proposed changes will be documented by the project manager, and the affected team members/staff will be notified.

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NEIC HEALTH AND SAFETY PLAN

General Information

1. Project Title: ABC Coke – Focused Multimedia Investigation Project Number: VP0944
2. Location: ABC Coke
900 Huntsville Avenue
Birmingham, Alabama 35217
3. Description of Field Activities: Multimedia onsite inspection
4. Date of Field Activities: Onsite inspection: May 4 – 10, 2011
5. Field Personnel: Martha Hamre
Doreen Au
Kristine Pordesimo
Linda TeKrony Project Manager
6. Contractor Personnel: n/a

Emergency Information

7. Ambulance: 911 Phone: 911
8. Hospital: Trinity Medical Center
800 Montclair Road
Birmingham, Alabama 35213 Phone: (205) 592-1000
9. Emergency Route: See attached map and directions
10. Fire Department: Tarrant Fire Department
2593 Commerce Circle
Birmingham, Alabama 35217 Phone: 911 or (205) 849-2820
11. Police: Tarrant Police Department
2593 Commerce Circle
Birmingham, Alabama 35217 Phone: 911 or (205) 841-5555
12. Poison Control Center: Phone: 1 800 222 1222
13. Site Emergency Notification/Evacuation Method: Will follow facility procedures, cell phone will be available
14. NEIC Health and Safety Officer: Steve Fletcher 303-462-9007
15. Radiation Safety Assistance: Jed Harrison, Director (702) 784-8220
Office of Radiation Programs/Las Vegas Facility

16. Check all known or potential hazards:

☐ Radiation ☒ Toxics ☒ Fire/Explosion ☒ Corrosives
☐ O₂ Deficiency ☒ Noise ☒ Physical ☐ Biological
☒ Dusts ☒ Heat/Cold Stress

17. Potential Chemical Hazard:

Chemical	Threshold Limit Value/Immediate Danger to Life or Health (TLV/IDLH)	Route of Exposure	Acute Symptoms	Odor Level	Odor/Visual Description
Ammonia	25 parts per million (ppm)/ 300 ppm	Inhalation, ingestion, contact	Eye, nose, and throat irritation; chest pain; skin burns; pulmonary edema; pink sputum	17 ppm	Colorless gas with a suffocating, pungent odor
Anthracene * (paranaphthalene)	0.2 milligrams per cubic meter (mg/m ³) (as coal tar pitch volatiles)/ 700 mg/m ³	Inhalation, ingestion, absorption, contact	Eye, skin, and respiratory tract irritation	Unknown	White to yellow crystalline solid
Benzene*	0.5 ppm 2.5 ppm short term exposure limit (STEL)/ 500 ppm skin	Inhalation, absorption, ingestion, contact	Nausea; headaches; eye, skin, and respiratory tract irritation	5 ppm	Colorless liquid with aromatic odor
Carbon monoxide	25 ppm/ 1,200 ppm	Inhalation	Headaches, dizziness, nausea, confusion	100,000 ppm	Colorless/odorless gas
Coal tar pitch volatiles or particulate polycyclic aromatic hydrocarbons (PPAH)*	0.2 mg/m ³ / 80 mg/m ³	Inhalation, ingestion, absorption, contact	Eye, skin, and respiratory tract irritation; dermatitis/skin rash; coughing, headache; dizziness	Unknown	Black or dark-brown, viscous liquid with naphthalene-like odor; sharp burning taste
Coke oven emissions *	0.15 mg/m ³ permissible exposure limit (PEL)	Inhalation, contact, and/or ingestion	Dermatitis, bronchitis	Unknown	Black or dark-brown "smoke"
Cyanides (as HCN)	5 mg/m ³ (4.7 ppm) ceiling/ 25 mg/m ³ Skin	Inhalation, absorption, ingestion, contact	Hypertension and tachycardia followed by hypotension and brachycardia; cherry-red mucous membranes to blue-tinged skin and mucous membranes; headache; vertigo; agitation; nausea; eye, skin, and respiratory tract irritation; dyspnea, pulmonary edema	~1 mg/m ³ (poor warning; not everyone can detect)	Colorless gas (HCN) or white granular or crystalline solids (salts) with a faint, almond-like odor
Dibenzofuran	None	Inhalation, absorption, ingestion, contact	Eye, skin, and respiratory tract irritation	Unknown	Colorless to white crystalline solid used as insecticide and organic synthesis

ABC Coke, Tarrant, Alabama

Chemical	Threshold Limit Value/Immediate Danger to Life or Health (TLV/IDLH)	Route of Exposure	Acute Symptoms	Odor Level	Odor/Visual Description
Diesel oil (fuel oil #2)	100 mg/m ³ Skin	Inhalation, ingestion, contact	Eye, skin, and respiratory tract irritation; nausea, headache	Unknown	Colorless to yellowish liquid with strong hydrocarbon odor
Ethyl benzene*	20 ppm/ 125 ppm (STEL)/ 800 ppm	Inhalation, ingestion, contact	Eye and mucus membrane irritation, headaches, dermatitis	0.6 ppm odor 140 ppm irritation	Colorless liquid with a pungent aromatic odor
Ethylene	200 ppm (simple asphyxiant, explosion hazard at high concentration)	Inhalation (simple asphyxiant)	Faintness, excitation, incoordination, contact with liquid causes freeze burns	76 ppm	Colorless gas with sweet odor, explosion hazard
Ethylene glycol (aerosol)	100 mg/m ³ ceiling	Inhalation, ingestion, contact	Eye, skin, and respiratory tract irritation; nausea; dizziness	60 ppm	Clear, colorless, odorless, syrupy liquid with sweet taste
Gasoline*	300 ppm Skin	Inhalation, ingestion absorption	Eye and nose irritation, nausea	0.3 ppm	Pungent aromatic odor
Hydrochloric acid (hydrogen chloride), (muriatic acid)	2 ppm ceiling/ 50 ppm	Inhalation, ingestion, contact	Nose and throat inflammation, coughing, burns throat, eyes and skin	1 ppm	Colorless gas with pungent odor, colorless to slightly yellow liquid
Kerosene (fuel oil #1) (jet fuel)	100 mg/m ³ recommended exposure limit (REL) Skin	Inhalation, ingestion, contact	Eye, nose, and throat irritation; headache; drowsiness; nausea; vomiting; chemical pneumonia	0.6 mg/m ³	Colorless to yellowish oily liquid with strong characteristic hydrocarbon odor
Lead and compounds*	0.05 mg/m ³ PEL/ 100 mg/m ³ (also use 0.012 mg/m ³ for Cr in lead chromate* and 0.01 mg/m ³ for As in lead arsenate*)	Inhalation, ingestion, contact	Weakness, insomnia, facial pallor, abdominal pain, colic, paralysis of wrist/ankles, flu-like symptoms, hypotension	None	Heavy, ductile, soft-grey solid to yellow crystals
Mercury and compounds	0.01 mg/m ³ alkyl 0.04 mg/m ³ ceiling PEL, 0.025 mg/m ³ other, 0.1 mg/m ³ ceiling PEL/ 10 mg/m ³ Skin	Inhalation, ingestion, absorption, contact	Drooling; coughing; dyspnea; foul breath; nausea; chest and abdominal pain; bloody diarrhea; eye, skin, and respiratory tract irritation/burns	Odorless	Silvery, extremely heavy liquid to white, heavy, odorless crystalline solid
Naphtha (coal tar)	100 ppm PEL/ 1,000 ppm (10% lower explosive limit [LEL])	Inhalation, ingestion, contact, absorption	Eye, skin, respiratory tract irritation; dizziness; headache; nausea	Variable; irritation provides warning	Characteristic petroleum odor

Chemical	Threshold Limit Value/Immediate Danger to Life or Health (TLV/IDLH)	Route of Exposure	Acute Symptoms	Odor Level	Odor/Visual Description
Naphthalene*	2 ppm/ 250 ppm Skin	Inhalation, absorption, ingestion, contact	Eye and skin irritation, nausea, malaise, headache, vomiting, excessive sweating	0.08 ppm	Colorless to brown crystals with an odor of mothballs
Petroleum distillates (naphtha, rubber solvent, petroleum naphtha or ether)	400 ppm/ 1,100 ppm (10% LEL)	Inhalation, ingestion, contact, absorption	Eye, skin, respiratory tract irritation; dizziness; headache; nausea	1 ppm	Characteristic petroleum odor
Phenanthrene	0.2 mg/m ³	Inhalation, ingestion, contact	Photosensitization of skin	Unknown	Colorless crystals with faint aromatic odor
Phenol	5ppm/ 250 ppm Skin	Inhalation, absorption, ingestion, contact	Eye, nose, and throat irritation; anorexia; low weight; weakness; muscle ache; pain; dark urine	0.06 ppm	Colorless to light-pink crystalline solid with a sweet, acrid odor
Propylene	500 ppm simple asphyxiant, explosion hazard	Inhalation	Asphyxiation, dizziness, faintness, irregular heartbeat, contact with liquid causes freeze burns	76 ppm	Colorless gas with sweet odor
Sodium hydroxide	2 mg/m ³ ceiling/ 10 mg/m ³	Inhalation, ingestion, contact	Eye, skin, and respiratory tract irritation and burns	None	White solid or colorless liquid, odorless
Styrene (monomer)	20 ppm, 200 ppm ceiling PEL/ 700 ppm Skin	Inhalation, ingestion, contact, absorption	Eye and nose irritation; drowsiness, weakness, unsteady gait; narcosis, metallic taste, headache	3 ppm	Colorless to yellow, oily, liquid with a sweet floral odor
Toluene	20 ppm, 300 ppm ceiling (PEL)/ 500 ppm Skin	Inhalation, absorption, ingestion, contact	Fatigue, weakness, dizziness, headaches, confusion, dilated pupils, eye irritation	5 ppm	Colorless liquid with a sweet pungent, benzene-like odor
1,2,4-trimethylbenzene	25 ppm	Inhalation, ingestion, contact	Eye, skin, nose, throat, and respiratory system irritation; bronchitis; hypochromic anemia; headache; drowsiness; fatigue; dizziness; nausea; incoordination; vomiting; confusion; chemical pneumonia	2 to 4 ppm	Clear, colorless liquid with a distinctive, aromatic odor
Xylenes	100 ppm/ 150 ppm STEL/ 900 ppm	Inhalation, ingestion, contact	Eye, nose, and throat irritation; dizziness; drowsiness	20 ppm	Colorless liquid with an aromatic odor

* Potential or confirmed carcinogen

18. Specify unusual working conditions/limitations: Will stay within elevated areas that are protected by handrails.

19. List tasks, potential hazards checked above, and control measures which will be taken, including levels of protection

Task	Hazards	Level of Protection (A, B, C, D) and Control Measures
LDAR monitoring in various process units	Toxics (e.g., volatile organic compounds), corrosives, noise, heat/cold stress	Level D or Level C (as necessary), with half-face or full-face respirator and P-100/organic vapor/acid gas combination cartridges, and will leave the area if LDAR monitoring indicates the need to upgrade to level B. Will wear hearing protection, will wear appropriate clothing, and will observe safe work practices.
BWON sampling (Grab samples)	Toxics, corrosives, noise, heat/cold stress	Level D or Level C (as necessary) with half-face or full-face respirator and P-100/organic vapor/acid gas combination cartridges, and nitrile gloves while in processing areas. Will follow company requirements for respiratory protection and the NEIC operating procedure <i>Respiratory Protection</i> , NEICPROC/00-038R3. Will wear appropriate clothing and observe safe work practices to prevent heat/cold stress (e.g., drink fluids, take breaks, etc.); will wear hearing protection.
Visual observations on top of coke battery	Particulates, toxics	Level D or Level C (as necessary) with half-face respirator and P-100/organic vapor/acid gas combination cartridges (increased visibility needed due to large moving equipment and impaired vision issues with high temperatures/fogging), safety glasses for visual observation on top of coke oven battery.
20. Health Hazard Monitoring Plan:	Substance-specific health hazard monitoring will not be conducted because based on process knowledge and conversations with company personnel; exposure potential to any chemical in a concentration above ambient levels is expected to be extremely low. A TVA-1000 will be available to determine exposure levels, as practicable.	
21. Site Control/Security Measures:	The inspected portions of the plant are maintained in an area secured by facility personnel.	
22. Decontamination Procedures:	Will use disposable sampling equipment. Personnel will observe good hygiene practices and follow the NEIC operating procedure <i>Field Safety and Health</i> , NEICPROC/00-034R1.	
23. Disposal Procedures:	Place disposable items in plastic bag and leave onsite with permission. If unable to leave items onsite, items will be bagged and returned to Denver for proper disposal according to the NEIC operating procedure <i>Field Safety and Health</i> , NEICPROC/00-034R1.	
24.	Required health and safety supplies: X Ice <input type="checkbox"/> Electrolyte Replacement X Bottled Drinking Water <input type="checkbox"/> Insect Repellant X Sunscreen <input type="checkbox"/> Other _____	

Approvals

This site HASP has been reviewed and constitutes the minimum anticipated safety requirements for personnel engaged in field activities at this project site. However, the project manager has the authority to change these requirements, based upon the conditions present at the site.

24. Approved by:

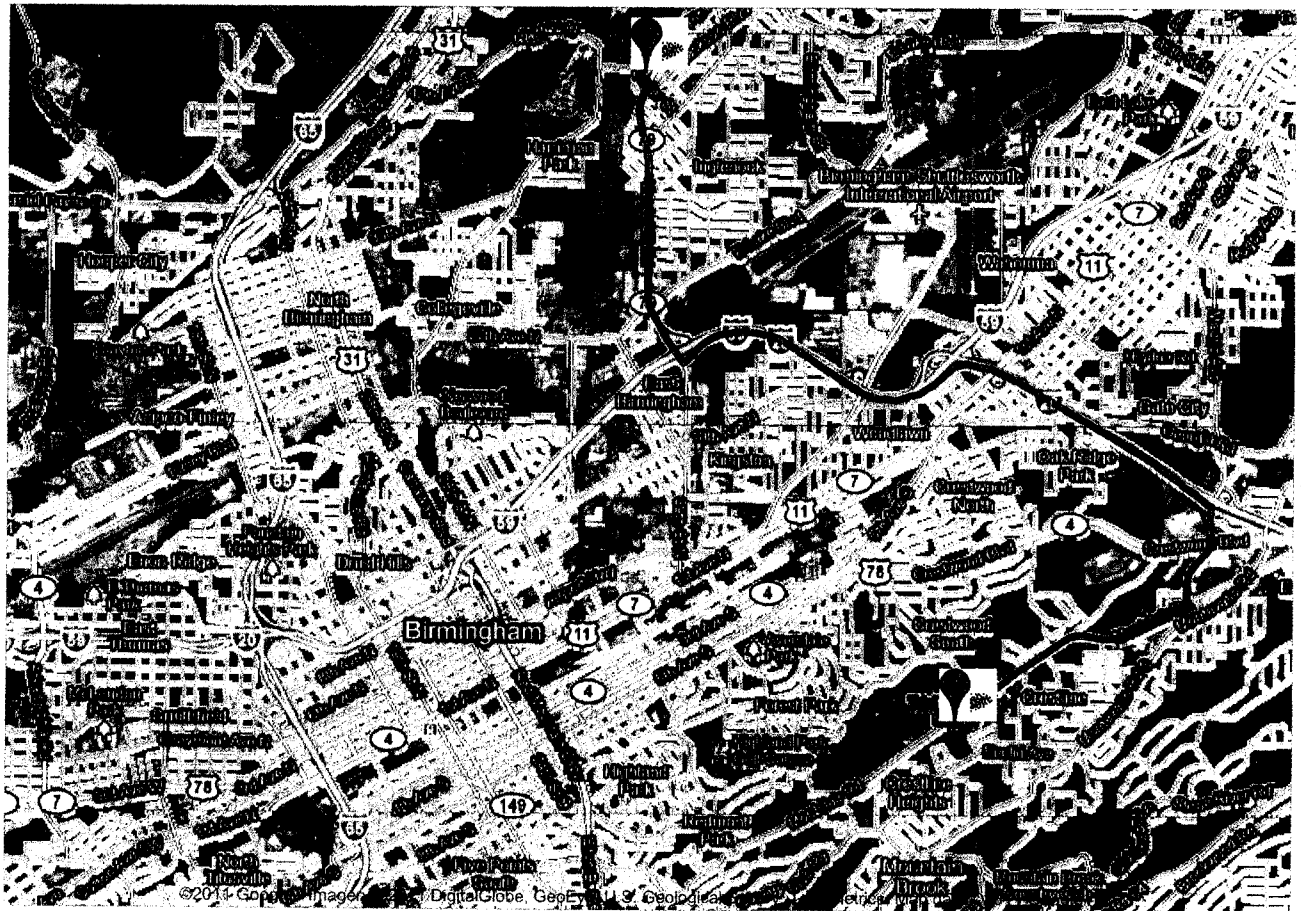
Project Manager: Martha Gandy Date: 4/20/11

Branch Chief: Greg Hester Date: 4-28-11


Health and Safety Officer: Steve Elliott Date: 4/20/11

Google maps

To see all the details that are visible on the screen, use the "Print" link next to the map.



Driving directions to 800 Montclair Rd, Birmingham, AL 35213

 **ABC Coke: Division Office & Sales Department Tarrant**
900 Huntsville Avenue
Birmingham, AL 35217

(205) 849-1300

- | | |
|---|--------|
| 1. Head southwest on Huntsville Ave toward Cedar St | 259 ft |
| 2. Take the 1st left onto Cedar St | 427 ft |
| 3. Take the 3rd right onto Pinson Valley Pkwy/Vanderbilt Rd | 1.4 mi |
| 4. Continue onto Tallapoosa St | 0.4 mi |
| 5. Turn left to merge onto I-20 E/I-59 N | 3.6 mi |
| 6. Take exit 132A for Oporto-Madrid Boulevard toward US-78 | 0.3 mi |
| 7. Turn right at Oporto Madrid Blvd | 0.7 mi |
| 8. Turn right at Montclair Rd | 1.7 mi |

 **800 Montclair Rd**
Birmingham, AL 35213

These directions are for planning purposes only. You may find that construction projects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.
Map data ©2011 Google

[Report a problem](#)

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ABC Cole w/ MEIC [5/5/11]
At Plant at 8am

things to ask:

ver. 4.5? contacted buyers?

how long in operation?

is written manual, plan?

qualified crew?

3 Apr

Changes in ceiling times?

Coms Reception

How old batteries? major remarks?

MEIC 3.0 + 4.0 linkages?

Close-on, ytd contact
for Rev, JEDH

Local from App. Bt

Low-mel. High mel

Waxes to get consistent

Blonds

→ 100% mass in oven 2 hrs

→ 24 hrs cure time

→ 231 w/samples:

Wax-Plast, you work,

Interment [Steel casting]

Waxes & Foundations in Ford Model

Indoor, Ensign like Plast bags

Decor work, Replacement

has given ideas to present

Disc will be made the worker

→ no real differences in Bt + P. Slows

→ DDI controls 303's promoting

3 w/samples w/samples

Pushing Reeling

- Highest quality when pushing sleds, allowed 2 or 3 per bit. 1 or 2 have

→ No issue w/ taking down it
but holding off pushing

→ Most furnaces can use
less quality rock compared
to foundries

→ For Decenters tough to
send, not easy to write

→ No need seasonal changes w/ ops.

Botany Tues 5/6
w/ Bruce Wise
Jason Howate

Course

Tree is susceptible to eye
bleeds to expanding at top

- End Flares most susceptible part
to thermal changes

- Leafy tip most susceptible to heat

- Regular maint. skeletons
Reverses leaves to bind and cross

- Go to Key the

- Atk can be dependent on the way
you take them

- Right back again

1) ^{wise} ~~State~~ crops at 10 keep stock
clean

- Kings of the clearing work

On top of Backus B.H.
Cyl-overs

~~Open~~ ~~water~~ cap / 11/15
no real leaks noted

catch soft air OP-10 - down
the head

- had to sit power side + ~~turning~~
being son

Had replaced in "S"

Product not being touch/tan

PUSH #52 at Son's ^{Drill's} at 200.

no other options

PUSH #42

301. for some 10 yrs, then more
Door handle

There is pretty well all in 6/11/11.

PUSH #32

Had 211 and VE
Quartz-Tone chain

5/10 close out w/ NEIC ^{at}
w/ DEIC comic books

ICDL
Ahmad
N.K.

Dose - Hamitz D. Dabose
Corey Masuca S. Hite

NEIC ABC
Mutha Mande Marc Poling
Dorenda Bob masen
Kristin Anderson Jeff McLeod

Modern League
Bill Osborn

ABC close out

NEIC will analyze lot samples,
Provide R4 w/ Draft comments give counts

1 A1 -> Cele by products
CDAR (BL), IR Can, cellites & EFF samples

in loc Raketa,

CDAR finding
1-250-300 compounds
-65 dog loss, -25 w/ elevated levels
-3 missing plus -54 tagged by nationalist
-100 of 1960s in 50s

10th (cont.)

- ~~For~~ some bigged camp. note on the list.
- Some ~~the~~ ^{looking} note as 'demon' is ~~not~~ in use
- some equipment was ~~rough~~

3-11-11

dependent on L

open drains, now locks are installed

ABX -

need to follow up w/ call to MFLC
w/ mail down walking

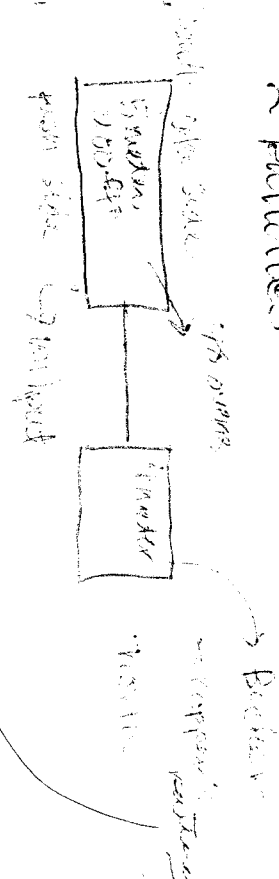
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8/9/10

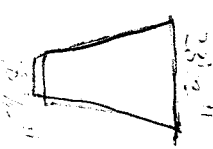
APC letter
 did they get - APC
 Mark Roling - APC
 Jason Horowitz - Jeff. County
 Ryan Brown - EPA
 David Lloyd - EPA
 Robert Rufford - EPA

1) will be done with under subpart C
 - I understand it to be under subpart C
 subpart C

2 pictures



2) done with the testing



even schedule

front side

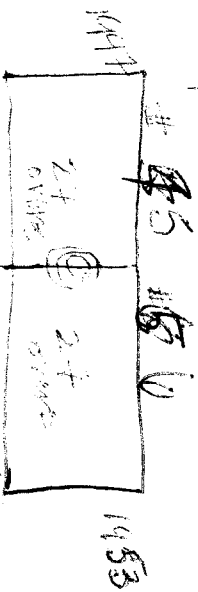
$$\pm 1/4" / 1/2" = 100\% \text{ accuracy}$$

Parker

1947, Kopper's building

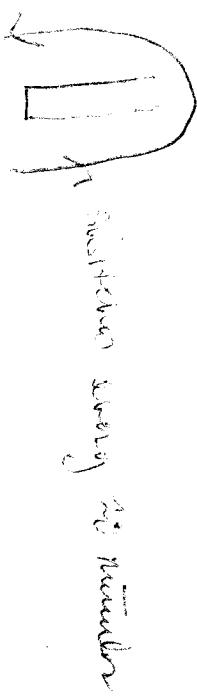
1947

54' 0" 0" 0"



→ these 2 ovals combined into one

→ Release gas every 20 minutes



Cable time

~~24 hrs.~~ 24 hrs. is minimum

→ 24 hrs. is minimum

→ 24 hrs. is minimum

→ 24 hrs. is minimum

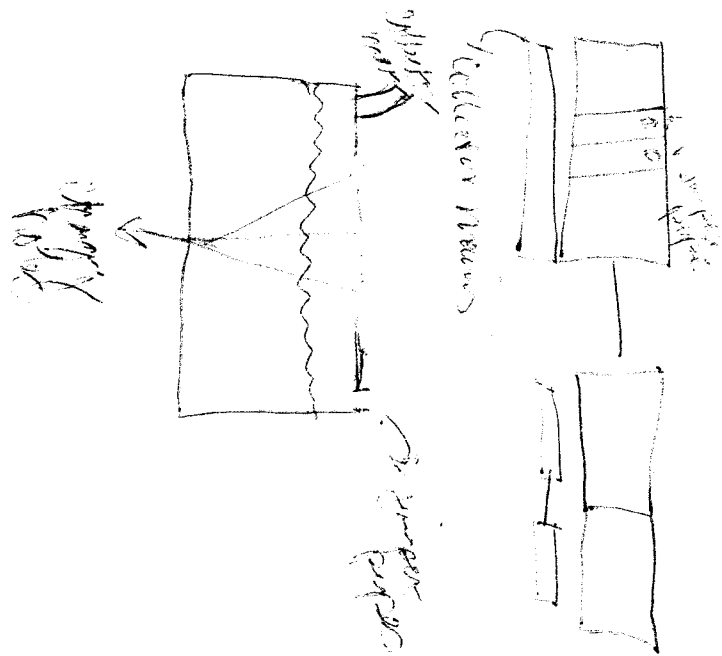
→ 24 hrs. is minimum

→ 24 hrs. is minimum

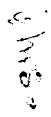
→ 24 hrs. is minimum

* All above can be done right now
 - 9 18 in is used stored
 lined cable/m. is always used.
 - 24 m like discuss that the top
 can be used means that clean left
 things

Open = short



W. H. C.



16. 11. 1911

[illegible]

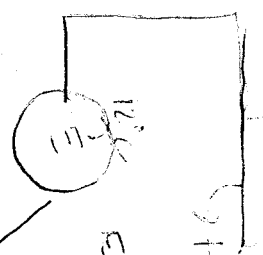
Dec ended to 282 F



300 LBS

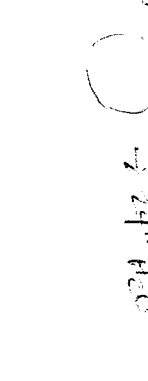
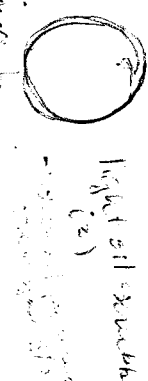
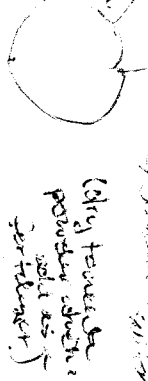
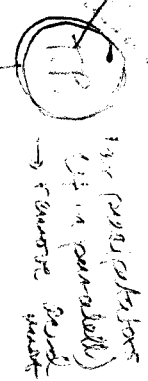
Exhausting
Ventilating

24" (1) 3000 ft
at 400' c)

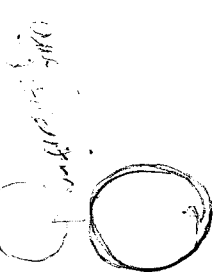


Exhauster
2550 HP
vertical
gas compressor

24" expansion
18 x 10 x 10 ft



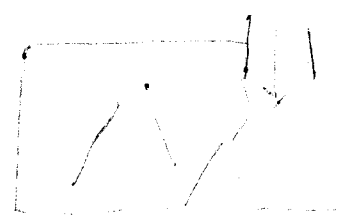
24" expansion
18 x 10 x 10 ft
some gas
oil separator



light oil separator
24" H2O

the water is in the water

to the 2000



Ammonium sulfate \rightarrow $2\text{NH}_4^+ + \text{SO}_4^{2-}$
 (a) full production

1 ton H₂SO₄ to make 1 ton ammonium sulfate

ammonium sulfate only used for fertilizer
 ammonia in fertilizer
 - kept in soil for 11%
 of year for 1 day longer etc

covered about ten

8/9/12
2:57 pm

Can, said or there

Can, said or there

8/9/12

15th

15th

15th

15th

15th

15th

15th

15th

15th

15th

15th

15th

15th

15th

15th

15th

15th

15th

15th

15th

15th

15th

Large building -
- estimated time of 1st visit

→ House in below (looking away)
to the north

→ Doors west of me

→ Light on stage front
- good lighting

→ count seats for 1st month
for 1st month
stand.

Wickets

3:45 - group in formation
- 2nd part 10-15% accuracy

Should get 1/2 the 50 miles in 1000

Part ③ 200 people inventory
④ full capacity 325 people

1000

David Lloyd
Bills opened
Bruce

David Lloyd
Ryan Pridem
Mick Bedford

7:00 AM
8/10/10

Questions for by-products
will-thrill

- 1) P & D chart
- 2) Policy of Repair list
- 3) Disposal to Repair list
- 4) Work fire procedure
- 5) list of components
- 6) sketch site
- 7) long lines in wilderness

Hood

- 55' in length
- contains 400 lbs
- radio remote control

95% of time don't have to travel
by the hood.

Release
to emergency
Reduces
- reduces
- reduces

hood doesn't always travel
all the way to the ground floor

-will build such the case
-the American people
-I mean, to. I mean to
-the world is that
-the world is that

→ from black (battery)

Exhibits: 1000 (reverse on
top) 10 after the house
20 before the house

→ 1000 (reverse on top)

Be one word of chin will
be detected - but other words will
be detected (as 1000 is a word)
would put it → every other place
detected & then removed

City: today days → light to all
City - Tuesday & Friday

→ Lab: increase for NPD's & aol

David Brown → Collaboration

Full 900
methane 500 ppm
methane 100 ppm

• 1000 methane 500 ppm
brown 2 yellowish white, soon during this
little glass

Oxbaro TVA-1000 → 12 years old

Zero - 1/7/2014
500 ppm - 1/7/2014
1000 ppm - 1/7/2014

→ Calibration looks good.
→ Bill & Donna inhibited

Hydrogen cylinder was → ultra high
purity
2300 psi

Key Products Time

→ in vacuum → reaction description -
fragments from highest oil
fragments → goes back to
secondary vacuum & then to
tertiary

→ added by process unit

→ in section but look for leaks
by monitoring O₂ & H₂ in the
1/16 in. line to the high
→ in order to locate leaks then

0511 - from in Detroit

→ approximately 800 components
→ 1 DMR program starts after the
Expansion component, before expansion
in negative feedback

Cold plate

North Beethoven 385,000

South Beethoven

Beethoven Beethoven 165,000

Early report from each shift - that
talks about on capacity, problems
on water which even other
changes (2) time if single capacity

→ there can be maintenance
on the day

→ this gives what information for
observing the capacity, so that
cracks etc. can be filled quickly

Cracks need to be open even longer maintenance
extended working time,

Antel → contractor that does welding (method of
→ steel bolts (K1117) installing rods)

2007 → last MACT work practice
exceedance.

Benzene wrote H_2O sampling →
grab samples monthly.

831 components total-144 subject to L
270 subject to V

fig - background
ACI - natural

notes to self - ✓ when get back to office
→ open-ended lines (for steam)
→ need to short-circuit end.

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05/05/11

ABC Coke Inspection

8:00 am arrived at facility

- gave instructions
clothes Stallworth

Steve Ricch (Region IV)

Jason (Jefferson County)

Hamm (Region IV)

Nichole Andrad (NEIC)

Linda McCarr. (NEIC)

Mark (NEIC)

Norman

Jeff Osborne

Bill Osborne

- today the plan was to perform the benzene

Sampling

- start by walking through some of the
by-product streams

- NEIC ask operations about process, loadings,

- conducted safety training

- receive a mix of coals (various volatile %)

- need coal with volatiles because a big
part of their business is by-products

- cooking time is ~ 24 hrs

05/05/11 ABC Coke Inspection

9: am Began walk around

- conducted a walk around of the gas and liquid streams
- mapped out areas of interest for afternoon sampling

~12:00 broke for lunch

12:45 returned from lunch

- discussed internally the areas where samples should be taken
- samples will be taken for benzene & naphthalene

~2:00 pm ~~men~~ went back out to plant to sample

Sample 1: Dirty liquor tank (combine of all streams prior to the liquor still)

- T = 151°F
- 3 sample vials (EPA),
- all sample vial (company)

05/05/11

ABC Coke Inspection

Sample 2: Ammonia still

T = 82.5 °F

- 3 sample vials taken (EPA)
- 2 sample vials taken (company)

Sample 3: Tar crum (out of hopper, that catches overflow) * Tar decanter

- collected slug with shovel and manually placed into vial

- 2 sample vials taken (EPA)
- 2 sample vials taken (company)

Sample 4: Primary cooler sump

T ≈ 132 °F

- 3 sample vial taken (EPA)
- 2 sample vials taken (company)

Sample 5: Dirty water sump

T ≈ 52.1 °F

- 3 sample vials (EPA)
- 2 sample vials (company)

05/05/11

ABC Inspection

Sample 6: Naphthalene Samp

- 3 Sample Vials taken (EPA)
- 2 Sample Vials taken (company)

Sample 7: COG line drip line (near dirty water samp) - off of "coke over gas" pipe

- 3 sample Vials (EPA)
- 2 sample Vials (company)

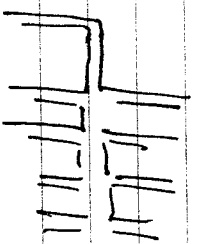
• got back to office and did overview for Fri

- departed @ 4:30

03/04/11

ABC Coke Inspection

8:00 arrived at facility



ovens are heated by very hot air through the flues. flues pipes run vertically along the oven walls

* ask for maintenance plan

- alternate burners under the ovens (bring at every other burner) to prevent over heating
- burn off gas from coke
- sweep direction periodically
- gas / air mix controlled with ports under ovens
- big emphasis on flue maintenance
- keep ovens air tight (by keeping pressurized) to prevent coke burning
- ceramic slabs (oven walls) have flues that are set up like an ATO with reversing flow and temperature

05/06/11

ABC Coke Inspection

'Coke charging'

- prior to the charge, a vacuum is put on the oven to reduce smoking

'door maintenance'

- aim to remove doors and repair at least once per year but due to damage from weathering, they normally have to be replaced more frequently

'doors have different door beads'

- knife edge & latch (tight)
- rounded, slide in (no latch) sealed

05/10/11
~~05/10/11~~

ABC Inspection (Close Out Confer)

start time: 4:00 pm

- Martha ~~Q~~ of NEIC gave the intro (went through names) and began the overview

Steps from here:

- 1) NEIC will review findings, samples results, and send RY a draft copy
 - Connie Rayne will be contacted by RY
- 2) draft will go to company once RY comments are received

Inspection

- focused on the by products facility
- did walk through, records review, LPA sampling, Subpart EF sampling

- preliminary findings

- Subpart L (samples taken)
 - found 65 component without tag
 - found 23 elevated reading
 - found 33 missing tags
 - found 55 valves not in
- ~~the~~ master list
- ~~the~~ joints were found looking but not tagged
- some steam and gas lines should not have been marked

05/10/11
~~05/10/11~~

ABC Coke Inspection (due Oct 2011)

- Subpart FF (Benzene, NESHAP)

• the exception on the ammonia
still is tied to compliance
with Subpart F
w/ no determinations yet but
they plan to evaluate
this

Blank